

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
3:22-MD-03036-KDB

IN RE: GARDASIL PRODUCTS LIABILITY  
LITIGATION

MDL No. 3036

THIS DOCUMENT RELATES TO  
ALL BELLWETHER CASES

**MERCK'S MOTION TO EXCLUDE TESTIMONY AND OPINIONS  
OF PLAINTIFFS' EXPERT MARTIN KULLDORFF, PH.D.**

Fed R. Evid. 702, Local Civ. R. 7.1

Defendants Merck & Co., Inc. and Merck, Sharp & Dohme LLC (together, "Merck")  
respectfully move to exclude the testimony of Plaintiffs' expert Martin Kulldorff, Ph.D. In  
support of this motion, Merck concurrently submits its Memorandum in Support.

This the 6th day of January, 2025.

/s/ Allyson M. Julien

Allyson M. Julien  
Co-Lead Counsel for Merck  
GOLDMAN ISMAIL TOMASELLI  
BRENNAN & BAUM LLP  
200 South Wacker Drive  
22nd Floor  
Chicago, IL 60606  
Telephone: (312) 881-5968  
Facsimile: (312) 881-5191  
ajulien@goldmanismail.com

David C. Wright III  
Liaison Counsel for Merck  
ROBINSON, BRADSHAW & HINSON P.A.  
101 N. Tryon Street, Suite 1900  
Charlotte, NC 28246

Telephone: (704) 377-8322  
Facsimile: (704) 373-3922  
dwright@robinsonbradshaw.com

David E. Dukes  
*Co-Lead Counsel for Merck*  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
1320 Main St., 17th Floor  
Columbia, SC 29201  
Telephone: (803) 255-9451  
Facsimile: (803) 256-7500  
david.dukes@nelsonmullins.com